

From: [Wyatt, Robert](#)
To: [Sean Sheldrake/R10/USEPA/US@EPA](#); [cstivers@anchorenv.com](#); [pdost@pearllegalgroup.com](#); [rbarth@anchorenv.com](#)
Cc: [tom.mccue@siltronic.com](#); [agladstone@davisrothwell.com](#); [jpeale@mfainc.org](#); [heastwood@davisrothwell.com](#); [jedwards@anchoragea.com](#); [cstivers@anchoragea.com](#); [robe@hahnenv.com](#); [jrenda@anchoragea.com](#); [Eric Blischke/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Kristine Koch/R10/USEPA/US@EPA](#); [PetersonLE@cdm.com](#); [ANDERSON.Jim@deq.state.or.us](#); [MCCLINCY.Matt@deq.state.or.us](#); [GAINER.Tom@deq.state.or.us](#); [LARSEN.Henning@deq.state.or.us](#); [Rene Fuentes/R10/USEPA/US@EPA](#)
Subject: Re: NW Natural, Segment 2 Test Plan In-water Piezometer Drilling and Installation Comments
Date: 10/09/2009 09:19 AM

Thanks Sean.

----- Original Message -----

From: Sheldrake.Sean@epamail.epa.gov <Sheldrake.Sean@epamail.epa.gov>
To: cstivers@anchorenv.com <cstivers@anchorenv.com>; pdost@pearllegalgroup.com <pdost@pearllegalgroup.com>; rbarth@anchorenv.com <rbarth@anchorenv.com>; Wyatt, Robert
Cc: McCue, Tom <Tom.McCue@siltronic.com>; agladstone@davisrothwell.com <agladstone@davisrothwell.com>; jpeale@mfainc.org <jpeale@mfainc.org>; Eastwood, Hanne <heastwood@davisrothwell.com>; pdost@pearllegalgroup.com <pdost@pearllegalgroup.com>; jedwards@anchoragea.com <jedwards@anchoragea.com>; cstivers@anchoragea.com <cstivers@anchoragea.com>; robe@hahnenv.com <robe@hahnenv.com>; jrenda@anchoragea.com <jrenda@anchoragea.com>; Blischke.Eric@epamail.epa.gov <Blischke.Eric@epamail.epa.gov>; Humphrey.Chip@epamail.epa.gov <Humphrey.Chip@epamail.epa.gov>; Koch.Kristine@epamail.epa.gov <Koch.Kristine@epamail.epa.gov>; PetersonLE@cdm.com <PetersonLE@cdm.com>; ANDERSON Jim M <ANDERSON.Jim@deq.state.or.us>; MCCLINCY Matt <MCCLINCY.Matt@deq.state.or.us>; GAINER Tom <GAINER.Tom@deq.state.or.us>; LARSEN Henning <LARSEN.Henning@deq.state.or.us>; Fuentes.Rene@epamail.epa.gov <Fuentes.Rene@epamail.epa.gov>
Sent: Fri Oct 09 09:16:19 2009
Subject: NW Natural, Segment 2 Test Plan In-water Piezometer Drilling and Installation Comments

Bob,

For the purposes of our in-water AOC, please consider the attached joint comment set an EPA approval with comments for the October 2009 data collection work. A response to comment deadline is provided in ODEQ's joint comment set letter (attached, below).

Let me know if you have any questions.

Thank you.

S

Sean Sheldrake, RPM, Unit Diving Officer
USEPA, Region 10
Environmental Cleanup Office
1200 Sixth Avenue, Suite 900, ECL-110
Seattle WA 98101-3140
sheldrake.sean@epa.gov
Phone: 206/553-1220 / Fax: 206/553-0124
Region 10 Dive Team: <http://yosemite.epa.gov/r10/oea.nsf/webpage/dive+team>
Portland Harbor Cleanup: <http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>
Green Cleanups:

<http://yosemite.epa.gov/R10/extaff.nsf/programs/greencleanups>

Deliveries: Parking Garage mailroom (1st floor)

Visitors: Check-in @ PERC / Service Center on 12th floor:

<http://yosemite.epa.gov/r10/extaff.nsf/PERC/Visiting+Seattle>

----- Forwarded by Sean Sheldrake/R10/USEPA/US on 10/09/2009 09:06 AM

"BAYUK Dana"
<BAYUK.Dana@deq.
state.or.us>
10/08/2009 04:38 PM
To
"Bob Wyatt" <rjw@nwnatural.com>
cc
<pdost@pearllegalgroup.com>,
"John Edwards"
<jedwards@anchorqea.com>, "Carl
Stivers"
<cstivers@anchorqea.com>,
<robe@hahnenv.com>, "John Renda"
<jrenda@anchorqea.com>, Eric
Blischke/R10/USEPA/US@EPA, Chip
Humphrey/R10/USEPA/US@EPA,
Kristine Koch/R10/USEPA/US@EPA,
Sean Sheldrake/R10/USEPA/US@EPA,
"ANDERSON Jim M"
<ANDERSON.Jim@deq.state.or.us>,
"MCCLINCY Matt"
<MCCLINCY.Matt@deq.state.or.us>,
"GAINER Tom"
<GAINER.Tom@deq.state.or.us>,
"LARSEN Henning"
<LARSEN.Henning@deq.state.or.us>
Subject
NW Natural, Segment 2 Test Plan
In-water Piezometer Drilling and
Installation Comments

Hello Bob.

DEQ reviewed the "Capture Zone Field Test Plan, Gasco, Portland, Oregon" (Test Plan) to EPA via e-mail on September 23, 2009. The Test Plan provides NW Natural's approach to assessing the influence of pumping uplands extraction wells on groundwater gradients beneath the shoreline and river along a portion of shoreline Segment 2. Segment 2 extends along the shoreline of NW Natural's property from near the south side of the FAMM leasehold north to the US Moorings site.

Given the current in-water work window closes October 31st, and to facilitate implementation of the overall Test Plan, NW Natural requested expedited review of the portions of the document specific to drilling

and installing nearshore and offshore piezometers. In response, DEQ and EPA conducted a focused review of Section 3.3, Table 1, figures 1 through 5, and Appendix A (i.e., Piezometer Design) of the Test Plan. In addition, our review(s) considered NW Natural's October 2nd e-mail reply to DEQ's September 30th e-mail requesting additional details regarding drilling and installing piezometers.

Soft copies of DEQ's comments letter and EPA's comments are attached. EPA's comments will be an attachment to the signed hard copy of DEQ's letter which will be sent to you via regular mail this week.

<<Lfnl-NWN-Segment2_TestPlan_piezoz.pdf>> <<GASCO Test Plan Piezo Comments (08-Oct-2009).pdf>>

The timeframe for conducting the proposed work is compressed, so DEQ approves NW Natural moving forward with planning and scheduling field work. However, approval for initiating the drilling work is contingent on DEQ receiving written responses to our and EPA's comments. Furthermore, DEQ is not requesting the Test Plan be revised at this time. DEQ will review and comment on the remainder of the Test Plan at a later date. If it is determined the Test Plan should be revised and resubmitted, NW Natural should plan on updating the sections pertaining to nearshore/offshore piezometers at that time.

Please feel free to contact me regarding this e-mail and the attachments.

Mr. Dana Bayuk, Project Manager

Cleanup & Portland Harbor Section

Oregon Department of Environmental Quality

2020 SW 4th Avenue, Suite 400

Portland, OR 97201

E-mail: bayuk.dana@deq.state.or.us

Phone: 503-229-5543

FAX: 503-229-6899

Please visit our website at <http://www.oregon.gov/DEQ/> (See attached

file: Lfnl-NWN-Segment2_TestPlan_piezos.pdf)(See attached file: GASCO
Test Plan Piezo Comments (08-Oct-2009).pdf)
----- Forwarded by Sean Sheldrake/R10/USEPA/US on 10/09/2009 09:06 AM

"BAYUK Dana"
<BAYUK.Dana@deq.
state.or.us> To
"Wyatt, Robert"
10/08/2009 04:45 <rjw@nwnatural.com>
PM cc
<pdost@pearllegalgroup.com>,
<jedwards@anchorqea.com>,
<cstivers@anchorqea.com>,
<robe@hahnenv.com>,
<jrenda@anchorqea.com>, Eric
Blischke/R10/USEPA/US@EPA, Chip
Humphrey/R10/USEPA/US@EPA,
Kristine Koch/R10/USEPA/US@EPA,
Sean Sheldrake/R10/USEPA/US@EPA,
"ANDERSON Jim M"
<ANDERSON.Jim@deq.state.or.us>,
"MCCLINCY Matt"
<MCCLINCY.Matt@deq.state.or.us>,
"GAINER Tom"
<GAINER.Tom@deq.state.or.us>,
"LARSEN Henning"
<LARSEN.Henning@deq.state.or.us>
Subject
RE: NW Natural, Segment 2 Test
Plan In-water Piezometer Drilling
and Installation Comments

Hello Bob.

DEQ's letter incorporates EPA's comments and reflects a joint review by
DEQ and EPA.

Let me know if you have additional questions.
Mr. Dana Bayuk, Project Manager
Cleanup & Portland Harbor Section
Oregon Department of Environmental Quality
2020 SW 4th Avenue, Suite 400
Portland, OR 97201
E-mail: bayuk.dana@deq.state.or.us
Phone: 503-229-5543
FAX: 503-229-6899

Please visit our website at <http://www.oregon.gov/DEQ/>
From: Wyatt, Robert [<mailto:rjw@nwnatural.com>]
Sent: Thursday, October 08, 2009 4:41 PM

To: BAYUK Dana
Cc: pdost@pearllegalgroup.com; jedwards@anchorqea.com;
cstivers@anchorqea.com; robe@hahnenv.com; jrenda@anchorqea.com;
blischke.eric@epa.gov; humphrey.chip@epa.gov; koch.kristine@epa.gov;
sheldrake.sean@epa.gov; ANDERSON Jim M; MCCLINCY Matt; GAINER Tom;
LARSEN Henning
Subject: Re: NW Natural, Segment 2 Test Plan In-water Piezometer
Drilling and Installation Comments

Thanks Dana,

NW Natural is also seeking EPA approval of the proposed work scope.

Thank you,

Bob

From: BAYUK Dana <BAYUK.Dana@deq.state.or.us>
To: Wyatt, Robert
Cc: pdost@pearllegalgroup.com <pdost@pearllegalgroup.com>; John Edwards
<jedwards@anchorqea.com>; Carl Stivers <cstivers@anchorqea.com>;
robe@hahnenv.com <robe@hahnenv.com>; John Renda <jrenda@anchorqea.com>;
blischke.eric@epa.gov <blischke.eric@epa.gov>; humphrey.chip@epa.gov
<humphrey.chip@epa.gov>; koch.kristine@epa.gov <koch.kristine@epa.gov>;
sheldrake.sean@epa.gov <sheldrake.sean@epa.gov>; ANDERSON Jim M
<ANDERSON.Jim@deq.state.or.us>; MCCLINCY Matt
<MCCLINCY.Matt@deq.state.or.us>; GAINER Tom
<GAINER.Tom@deq.state.or.us>; LARSEN Henning
<LARSEN.Henning@deq.state.or.us>
Sent: Thu Oct 08 16:38:11 2009
Subject: NW Natural, Segment 2 Test Plan In-water Piezometer Drilling
and Installation Comments

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